

Bradley, Megan

From: Bertram, Emily
Sent: Thursday, January 30, 2020 9:04 AM
To: Vogler, Tina
Cc: Beach, James
Subject: RE: [External] RE: Braskem TVOP renewal 23-00012

Good morning, Tina,

Thank you for providing all of the materials for the draft title V renewal for Braskem, including the facility's revised RACT II determination. I have reviewed the revision to the RACT II technical review memo, as well as DEP's response to EPA's comments provided back in 2017 and the draft permit. We have no further comments. If you could provide me with an electronic copy of the final permit upon issuance, that would be greatly appreciated.

Thanks!
Emily

Emily Bertram
Physical Scientist
Permits Branch
Air and Radiation Division
U.S. EPA Region 3
1650 Arch Street, 3AD10
Philadelphia, PA 19103
215-814-5273 | bertram.emily@epa.gov

From: Vogler, Tina <tvogler@pa.gov>
Sent: Friday, January 17, 2020 2:00 PM
To: Bertram, Emily <Bertram.Emily@epa.gov>
Cc: Beach, James <jamesbeach@pa.gov>
Subject: RE: [External] RE: Braskem TVOP renewal 23-00012

Emily,

DEP would intend to include the following items with the issuance of the renewed operating permit/RACT determination permit.

Items in the outlook item attached for the renewal:

- Review Memo TR 23-00012 draft 12-20-19
- The Permit draft 12-23-19 RACT
- Newspaper article for the renewal: NP 23-00012

Items for RACT:

A review memo addendum (which includes DEP response to RACT comments) Review memo addendum 12-30-2019

- The original RACT Review Memo: XS RACT Review Memo 3-28-17
- Comments & Response document: Comment & Response Braskem RACT II 11-2019
- Newspaper article for RACT: PA Bulletin-newspaper hearing notices 2019

Braskem's case by case RACT has not yet been noticed as a SIP action. That is yet to come. (I am waiting for a hearing date).

Thanks for your help.

Tina Vogler, P.E. | Air Quality Engineer
Department of Environmental Protection | Southeast Regional Office
2 East Main Street | Norristown, PA 19401
Phone: 484.250.5069 | Fax: 484.250.5921
www.dep.pa.gov

From: Bertram, Emily <Bertram.Emily@epa.gov>
Sent: Friday, January 17, 2020 11:41 AM
To: Vogler, Tina <tvogler@pa.gov>
Cc: Beach, James <jamesbeach@pa.gov>
Subject: [External] RE: Braskem TVOP renewal 23-00012

ATTENTION: This email message is from an external sender. Do not open links or attachments from unknown sources. To report suspicious email, forward the message as an attachment to CWOPA_SPAM@pa.gov.

Hi Tina,

Just checking in to see if there was anything more on the case by case RACT II for Braskem? I'd be interested in seeing the final version (after the response to comment, back and forth, etc. that we did back in November) of the facility's RACT II determination. I'm guessing there's a separate review memo for that, as this title V renewal review memo just briefly mentions RACT but doesn't include the RACT analyses.

Also, was Braskem's case by case RACT noticed as a SIP action, in addition to the permit action? Or is that still to come?

Thanks!
Emily

Emily Bertram
Physical Scientist
Permits Branch
Air and Radiation Division
U.S. EPA Region 3
1650 Arch Street, 3AD10
Philadelphia, PA 19103
215-814-5273 | bertram.emily@epa.gov

From: Vogler, Tina <tvogler@pa.gov>
Sent: Monday, December 23, 2019 4:17 PM
To: Bertram, Emily <Bertram.Emily@epa.gov>
Cc: Beach, James <jamesbeach@pa.gov>
Subject: Braskem TVOP renewal 23-00012

Emily,
I don't know if you realized it or not, but DEP is combining the renewal and RACT issuance into one permit. DEP will however notice the renewal separately from the RACT public hearing notice.

Braskem, a polypropylene manufacturer, is Title V for VOCs. Applicable Federal regulations are:

40 CFR Part 60, Subpart DDD-*Standards of Performance for Volatile Organic Compound Emissions from the Polymer Manufacturing Industry*

40 CF Part 60, Subpart VV- *Standards of Performance for Equipment Leaks of VOC in the Synthetic Organic Chemicals Manufacturing Industry for which Construction, Reconstruction or Modification Commenced After January 5, 1981 and on or before November 7, 2006*

40 CFR Part 63, Subpart ZZZZ -*National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines*

If you wish to review the Braskem permit for the renewal, here is a copy, which should be basically the same as from 11/22/19, except for some typographical items. I'm also attaching the review memo for the renewal and a newspaper article for the renewal, which was sent to the company. Publication of the renewal article in the Pa. Bulletin is expected on January 4, 2020.

I will provide a separate article for RACT, once the date for the public hearing is settled.

Thanks again for your help.
Happy Holidays!

Tina Vogler, P.E. | Air Quality Engineer
Department of Environmental Protection | Southeast Regional Office
2 East Main Street | Norristown, PA 19401
Phone: 484.250.5069 | Fax: 484.250.5921
www.dep.pa.gov

From: Bertram, Emily <Bertram.Emily@epa.gov>
Sent: Wednesday, December 4, 2019 11:42 AM
To: Vogler, Tina <tvogler@pa.gov>
Cc: Beach, James <jamesbeach@pa.gov>; Tulloch-Reid, Janine <jtullochre@pa.gov>
Subject: RE: [External] FW: Braskem RACT 23-00012

Hi Tina,

I hope you had a nice holiday. Thank you for providing a response to EPA's comments on Braskem's RACT II determination. DEP's responses address EPA's concerns - mainly, that the proposed RACT II is no less stringent than RACT I. Thank you for providing a comparison table of RACT I to RACT II, illustrating this. And it appears the permit includes 10 lbs/hr and 240 lbs/day VOC emission limits for Plant 1. EPA has no further comment. If you could provide us with an electronic copy of the final permit upon issuance, that would be greatly appreciated.

Thanks,
Emily

Emily Bertram
Physical Scientist
Permits Branch
Air and Radiation Division

U.S. EPA Region 3
1650 Arch Street, 3AD10
Philadelphia, PA 19103
215-814-5273 | bertram.emily@epa.gov

From: Vogler, Tina <tvogler@pa.gov>
Sent: Friday, November 22, 2019 1:19 PM
To: Bertram, Emily <Bertram.Emily@epa.gov>
Subject: RE: [External] FW: Braskem RACT 23-00012

Emily,
Here is DEP's response to EPA comments made by Cynthia Stahl, received in DEP on 6/20/2017. The revised proposed RACT permit is attached. P.28 #002, p.30 #006(e) and p.32 #009(b)(ii) are conditions for emissions limits added to the original RACT ii (issuance 4/3/2017) per comment #3. I've also looked at the RACT 1 permit, apart from the emissions limitations added in response to comment #3, and sought conditions that would be in the proposed RACT I/II permit that are at least as stringent as RACT I (Attachment 3).

Please let me know if DEP has answered EPA's concerns.

Tina Vogler, P.E. | Air Quality Engineer
Department of Environmental Protection | Southeast Regional Office
2 East Main Street | Norristown, PA 19401
Phone: 484.250.5069 | Fax: 484.250.5921
www.dep.pa.gov

From: Bertram, Emily <Bertram.Emily@epa.gov>
Sent: Friday, November 15, 2019 3:44 PM
To: Vogler, Tina <tvogler@pa.gov>
Cc: Beach, James <jamesbeach@pa.gov>
Subject: RE: [External] FW: Braskem RACT 23-00012

Hi Tina,

Thanks, that would be good. I would also if I were you double check the RACT I SIP'd requirements for Braskem and ensure that the proposed case by case RACT II is at least the same if not more stringent than RACT I. I am thinking this was the topic of the conversation we had last year. If I have the opportunity next week, I will see if I can pull the FR for Epsilon for the SIP'd RACT I. I'm sure this was done awhile back but I think I'll have to recreate a record on this one!

Emily Bertram
Physical Scientist
Permits Branch
Air and Radiation Division
U.S. EPA Region 3
1650 Arch Street, 3AD10
Philadelphia, PA 19103
215-814-5273 | bertram.emily@epa.gov

From: Vogler, Tina <tvogler@pa.gov>
Sent: Friday, November 15, 2019 2:26 PM
To: Bertram, Emily <Bertram.Emily@epa.gov>

Cc: Beach, James <jamesbeach@pa.gov>

Subject: RE: [External] FW: Braskem RACT 23-00012

Emily,

I looked back through the files and it appears that a formal response to EPA's comments on the RACT II (by Cynthia Stahl) was prepared by Xiaoyin Sun (then permit writer, who has retired), but never sent on to EPA, probably because of issues with the comment on the 10 pounds/hr and 240 pounds/day VOC limits for Plant # 1 (Comment #3).

I'll prepare a response to Comment #3, in light of current EPA guidance, and send the responses along to EPA.

Have a good weekend as well.

Tina Vogler, P.E. | Air Quality Engineer
Department of Environmental Protection | Southeast Regional Office
2 East Main Street | Norristown, PA 19401
Phone: 484.250.5069 | Fax: 484.250.5921
www.dep.pa.gov

From: Bertram, Emily <Bertram.Emily@epa.gov>

Sent: Friday, November 15, 2019 10:21 AM

To: Vogler, Tina <tvogler@pa.gov>

Cc: Tulloch-Reid, Janine <jtullochre@pa.gov>; Beach, James <jamesbeach@pa.gov>; Schmitt, Ellen <Schmitt.Ellen@epa.gov>

Subject: [External] FW: Braskem RACT 23-00012

ATTENTION: This email message is from an external sender. Do not open links or attachments from unknown sources. To report suspicious email, forward the message as an attachment to CWOPA_SPAM@pa.gov.

Good morning Tina,

I apologize for the delay in getting back to you regarding Braskem. Ellen Schmitt (from Planning) had reviewed and prepared EPA's comments on Braskem's RACT II proposal, however, Ellen is out of the office until Dec 4. I remember EPA and SERO having a phone conversation regarding EPA's comments on Braskem's proposed CbC RACT II back at the beginning of 2018. However, I don't see a record of a response to comment from SERO. This write up from Braskem that you attached regarding one of EPA's comments may partially address it that particular comment, but I am not sure it would in entirety. Did SERO ever send EPA a response to comment document? If so, I apologize but can you resend it? Perhaps it makes sense on this one to regroup and have a call so we can get it out the door? I am cc'ing Janine and Jim, as I think one or both of them were involved in this a few years back. I believe EPA's concern was in regard to Braskem (then Epsilon)'s RACT I requirements and anti-backsliding?

Could we set up a call to discuss and regroup/get on the same page? I am available Monday-Thursday of next week, with the exception of a few meetings. Unfortunately, Ellen will not be around to join, but I can try and pick up the pieces?

Thanks, have a nice weekend!

Emily

Emily Bertram
Physical Scientist
Permits Branch

Air and Radiation Division
U.S. EPA Region 3
1650 Arch Street, 3AD10
Philadelphia, PA 19103
215-814-5273 | bertram.emily@epa.gov

From: Vogler, Tina <tvogler@pa.gov>
Sent: Monday, October 07, 2019 4:14 PM
To: Bertram, Emily <Bertram.Emily@epa.gov>
Subject: Braskem RACT 23-00012

Emily,

To change the subject. .. Here is Braskem's RACT proposal, addressing Cynthia Stahl's Comment #3 made in her letter dated 6/14/2017 to James Rebarchak.

We would appreciate comments from EPA.

Tina Vogler, P.E. | Air Quality Engineer
Department of Environmental Protection | Southeast Regional Office
2 East Main Street | Norristown, PA 19401
Phone: 484.250.5069 | Fax: 484.250.5921
www.dep.pa.gov